

Update to RA

Mike,

As an update to my Tuesday, August 14, email with EPA's comments to the Navy's Parcel G Workplan, the Navy is questioning EPA's requirement to use the current version of our risk model to ensure that the cleanup goals fall within the risk range set by Superfund regulations. However, outside of Superfund requirements, the Navy cannot transfer property without a letter from the State of California giving a "recommendation for radiological unrestricted release." The California Department of Toxic Substances Control (DTSC) comment letter on the Parcel G Workplan requires the Navy to clean radionuclides to a stricter goal, that is, to the level of reference background or naturally occurring material. Please let me know if you would like to discuss this matter further.

Enrique

'DTSC believes that a data point that exceeds an RG does not meet the RAO unless the Navy can demonstrate that the data point is NORM/background.'

5. If data exceeds RAO/RGs, the Work Plan indicates that further evaluation would be conducted to determine whether Site conditions are protective of human health using US EPA's current guidance on Radiation Risk Assessment. This would not meet CDPH's requirement to obtain levels similar to naturally occurring levels and/or anthropogenic background levels. As stated in the enclosed CDPH memo, "a final status survey report that compares the distribution of data from the building/excavation sites with applicable reference area data and documents the remediation efforts" will be required. Soil concentrations that exceed RGs plus reference area data (background levels) cannot be left in place. If left in place, CDPH has indicated that it cannot issue a recommendation for radiological unrestricted release to DTSC. Therefore, the Work Plan needs to be revised accordingly.